

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Marc E. Hirschfield
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SYLVIA JOEL, individually, as trustee for the
Article Third Trust, as trustee for the Article Fourth
Trust, and as general partner of the Martin J. Joel
Partnership,

AMY JOEL,

Adv. Pro. No. 10-04291 (SMB)

PATRICIA SAMUELS,
HOWARD SAMUELS,
ANDREW SAMUELS,
DARA SANDLER,
MARTIN J. JOEL PARTNERSHIP,
ARTICLE THIRD TRUST UNDER WILL OF
MARTIN J. JOEL JR. DECEASED CARE OF
SYLVIA JOEL,
ARTICLE FOURTH TRUST UNDER WILL OF
MARTIN J. JOEL JR. DECEASED CARE OF
SYLVIA JOEL,
DELTA FUND I, LP,
DELTA (CAYMAN) VENTURES LTD., as
general partner of Delta Fund I, LP, and
HARVEY KRAUSS, as trustee for the Article Third
Trust and as trustee for the Article Fourth Trust,

Defendants.

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date before which the above-captioned Defendant(s) (individually and collectively, the “Defendants”) may move, answer or otherwise respond to the complaint (the “Complaint”) filed in the above-captioned adversary proceeding is extended up to and including September 19, 2014.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a

waiver of the Defendants' right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that as of the date of this stipulation, all natural person Defendants represented by the undersigned counsel in the adversary proceeding are alive or that counsel has previously provided notice to the Trustee in writing of all natural person Defendants' death; (ii) expressly agrees to notify the Trustee in writing of the death of any Defendant within thirty (30) days of the date of such Defendant's death, and to provide to the Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising the Trustee whether a probate has or will be filed, (b) filing a stipulation substituting the deceased Defendant's estate or personal representative/executor and/or (c) advising the Trustee who will represent the deceased Defendant's estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental

Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences
(ECF-7037) in the above-captioned case (No. 08-01789 (SMB)).

Dated as of: August 14, 2014

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

McLAUGHLIN & STERN LLP

By: /s/ Harvey Krauss
McLaughlin & Stern, LLP
260 Madison Avenue
New York, New York 10016
Telephone: (212) 455-0369
Facsimile: (212) 448-0066
Harvey Krauss
Email: HKRAUSS@mclaughlinstern.com

*Attorneys for Defendants Sylvia Joel and the
Estate of Martin Joel*

JASPAN SCHLESINGER LLP

By: /s/ Shannon Scott
300 Garden City Plaza
Garden City, New York 11530
Telephone: (516) 746-8000
Facsimile: (516) 393-8282
Steven R. Schlesinger
Email: sschlesinger@jaspanllp.com
Shannon Scott
Email: sscott@jaspanllp.com

*Attorneys for Defendants Amy Joel, Patricia
Samuels, Howard Samuels, Andrew Samuels,
and Dara Sandler*